

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ROYCE GOODSON,

Plaintiff,

v.

**CITY OF MONTGOMERY,
WILLIAM J. KOTLAN, AND
JOHN FOX**

Defendants.

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CIVIL ACTION _____

EXHIBIT A: INDEX OF ATTACHMENTS

1. Citation served on Defendant City of Montgomery;
2. Citation served on William J. Kotlan;
3. Citation served on John Fox;
4. Plaintiff's Original Petition;
5. No Docket Control Order issued; and
6. Civil Case Information Sheet.

Respectfully Submitted:

OLSON & OLSON, L.L.P.

By: /s/Brian J. Begle

BRIAN J. BEGLE

State Bar No. 00785311

Federal I.D. No. 15767

JOHN J. HIGHTOWER

State Bar No. 09614200

Federal I.D. No. 5758

Wortham Tower, Suite 600

2727 Allen Parkway

Houston, Texas 77019

(713) 533-3800 - Phone

(713) 533-3888 – Facsimile

ATTORNEYS FOR DEFENDANTS,

3586

Pd1

CITATION

CLERK OF THE COURT
BARBARA GLADDEN ADAMICK
P.O. BOX 2985
CONROE, TEXAS 77305

ATTORNEY/PARTY REQUESTING SERVICE
ERIC YOLLIK
P.O. BOX 7571
THE WOODLANDS TX 77387

THE STATE OF TEXAS

NOTICE TO DEFENDANT: You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.
To: CITY OF MONTGOMERY, BY SERVING THE MAYOR, JOHN FOX

1235 101 OLD PLANTERSVILLE RD
MONTGOMERY, TX 77356

You are hereby commanded to appear by filing a written answer to the ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable 284 Judicial District Court of Montgomery County, Texas at the Courthouse of said County in Conroe, Texas.

Said ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE was filed in said court on the 26th day of JULY, 2013 numbered 13-07-07934-CV on the docket of said court, and styled, ROYCE GOODSON VS CITY OF MONTGOMERY, WILLIAM J. KOTLAN, AND JOHN FOX

The nature of plaintiff's demand is fully shown by a true and correct copy of ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at Conroe, Texas on the 29th day of JULY, 2013.

Barbara Gladden Adamick, District Clerk
Montgomery County, Texas

(SEAL)

By Donna J. Jullotto Deputy

13 AUG -2 AG 25

RECEIVED
CONSTABLE GENERAL
PCL1 MONTGOMERY COUNTY TX

JUL 31 PM 2:08

RECEIVED
CONSTABLE GENERAL
PCL1 MONTGOMERY COUNTY TX

SCANNED 8/26

OFFICER'S RETURN

Cause No: 13-07-07934-CV

Style: ROYCE GOODSON VS CITY OF MONTGOMERY, WILLIAM J. KOTLAN, AND JOHN FOX

284 Judicial District Court

To: CITY OF MONTGOMERY, BY SERVING THE MAYOR, JOHN FOX

Address for Service: 101 OLD PLANTERSVILLE RD MONTGOMERY, TX 77356

Came to hand the 2 day of August, 2013, at 9:25 o'clock, and executed in MONTGOMERY County, Texas by delivering to each of the within named defendants in person, a true copy of this Citation with the date of delivery endorsed thereon, together with the accompanying copy of the ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE, at the following times and places, to wit:

City of Montgomery by Serving John Fox 24 Aug 2013 101 Old Plantersville Rd Montgomery TX 77356
 Manner of service: In Person

*And not executed as to the defendant(s) _____

The diligence used in finding said defendant(s) being: _____

and the cause or failure to execute this process is: _____

and information received as to the whereabouts of said defendant(s) being: _____

FEES:

Serving Petition and Copy \$ _____

TOTAL \$ _____

By: Don Chumley OFFICER
Don Chumley Deputy
 County, Texas

Affiant

Montgomery County
 Constable Precinct #1
 115 Business Park Dr.
 Houston, TX 77058

Complete if you are a person other than a Sheriff, Constable, or Clerk of the Court. In accordance with Rule 107: the officer or authorized person who serves, or attempts to serve a citation shall sign the return. The return must either be verified or be signed under penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

My full name is _____ my date of birth is _____, and my address is _____.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the _____ day of _____ 20____.

Declarant/Authorized Process Server

ID# & Exp. of Certification _____

Pet 3

CITATION

CLERK OF THE COURT
BARBARA GLADDEN ADAMICK
P.O. BOX 2985
CONROE, TEXAS 77305

ATTORNEY/PARTY REQUESTING
ERIC YOLICK
P.O. BOX 7571
THE WOODLANDS TX 77387

RECEIVED AND FILED
SEP 03 2013
BARBARA GLADDEN ADAMICK
District Clerk
MONTGOMERY COUNTY TEXAS
By *[Signature]*

THE STATE OF TEXAS

NOTICE TO DEFENDANT: You have been sued. You may employ attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.
To: WILLIAM J. KOTLAN

186X 8 LAKE FOREST DR
CONROE, TX 77384

You are hereby commanded to appear by filing a written answer to the ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable 284 Judicial District Court of Montgomery County, Texas at the Courthouse of said County in Conroe, Texas.

Said ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE was filed in said court on the 26th day of JULY, 2013 numbered 13-07-07934-CV on the docket of said court, and styled, ROYCE GOODSON VS CITY OF MONTGOMERY, WILLIAM J. KOTLAN, AND JOHN FOX

The nature of plaintiff's demand is fully shown by a true and correct copy of ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at Conroe, Texas on the 29th day of JULY, 2013.

Barbara Gladden Adamick, District Clerk
Montgomery County, Texas

(SEAL)

By *[Signature]* Deputy

13 AUG - 1 PM 2:59
RECEIVED
CONSTABLE RYAN GABLE
MONTGOMERY CO. TX
281-364-4212

RECEIVED
CONSTABLE GENE DEFORD
MONTGOMERY CO. TX
2013 JUL 31 PM 2:06

SCANNED

OFFICER'S RETURN

Cause No: 13-07-07934-CV

284 Judicial District Court

Style: ROYCE GOODSON VS CITY OF MONTGOMERY, WILLIAM J. KOTLAN, AND JOHN FOX

To: WILLIAM J. KOTLAN

Address for Service: 8 LAKE FOREST DR CONROE, TX 77384

Came to hand the 01 day of August, 2013, at 2:57 o'clock, and executed in Montgomery County, Texas by delivering to each of the within named defendants in person, a true copy of this Citation with the date of delivery endorsed thereon, together with the accompanying copy of the ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE, at the following times and places, to wit:

Name Date/Time Place, Course and Distance from Courthouse
William J. Kotlan 09:24 AM 633A 8 Lake Forest Dr Conroe TX 77384

Manner of service: Personal

*And not executed as to the defendant(s) _____

The diligence used in finding said defendant(s) being: _____

and the cause or failure to execute this process is: _____

and information received as to the whereabouts of said defendant(s) being: _____

FEES:

Serving Petition and Copy \$ _____
 NOTABLE, Constable Pct. 3 Montgomery County \$ _____
 1520 Lake Front Circle, Ste 200
 The Woodlands, Texas 77380
 (281) 364-4211

OFFICER
 County, Texas
 Deputy

By: _____

Deputy

Affiant

Complete if you are a person other than a Sheriff, Constable, or Clerk of the Court. In accordance with Rule 107: the officer or authorized person who serves, or attempts to serve a citation shall sign the return. The return must either be verified or be signed under penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

My full name is _____ my date of birth is _____, and my address is _____.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the _____ day of _____ 20____.

Declarant/Authorized Process Server

ID# & Exp. of Certification _____

3586

Pd1

CITATION

CLERK OF THE COURT
BARBARA GLADDEN ADAMICK
P.O. BOX 2985
CONROE, TEXAS 77305

ATTORNEY/PARTY REQUESTING SERVICE
ERIC YOLICK
P.O. BOX 7571
THE WOODLANDS TX 77387

RECEIVED AND FILED

AUG 28 2013

THE STATE OF TEXAS

NOTICE TO DEFENDANT: You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

To: CITY OF MONTGOMERY, BY SERVING THE MAYOR, JOHN FOX

1235 101 OLD PLANTERSVILLE RD
MONTGOMERY, TX 77356

You are hereby commanded to appear by filing a written answer to the ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable 284 Judicial District Court of Montgomery County, Texas at the Courthouse of said County in Conroe, Texas.

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The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at Conroe, Texas on the 29th day of JULY, 2013.

Barbara Gladden Adamick, District Clerk
Montgomery County, Texas

(SEAL)

By Eric Yolick Deputy

13 AUG -2 10:25

AUG 28 2013

RECEIVED
CLERK OF THE COURT
MONTGOMERY COUNTY, TEXASCLERK OF THE COURT
MONTGOMERY COUNTY, TEXAS

SCANNED

CITATION

CLERK OF THE COURT
BARBARA GLADDEN ADAMICK
P.O. BOX 2985
CONROE, TEXAS 77305

ATTORNEY/PARTY REQUESTING SERVICE
ERIC YOLICK
P.O. BOX 7571
THE WOODLANDS TX 77387

THE STATE OF TEXAS

NOTICE TO DEFENDANT: You have been sued. You must employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.
To: JOHN FOX

123S 101 OLD PLANTERSVILLE RD
MONTGOMERY, TX 77356

You are hereby commanded to appear by filing a written answer to the ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable 284 Judicial District Court of Montgomery County, Texas at the Courthouse of said County in Conroe, Texas.

Said ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE was filed in said court on the 26th day of JULY, 2013 numbered 13-07-07934-CV on the docket of said court, and styled, ROYCE GOODSON VS CITY OF MONTGOMERY, WILLIAM J. KOTLAN, AND JOHN FOX

The nature of plaintiff's demand is fully shown by a true and correct copy of ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at Conroe, Texas on the 29th day of JULY, 2013.

Barbara Gladden Adamick, District Clerk
Montgomery County, Texas

(SEAL)

By Eric Yolick Deputy

13 AUG -2 10 25

RECEIVED
CLERK OF THE COURT
MONTGOMERY COUNTY
TX

RECEIVED
CLERK OF THE COURT
MONTGOMERY COUNTY
TX
JUL 31 2013
PM 2:09

SCANNED

OFFICER'S RETURN

Cause No: 13-07-07934-CV

284 Judicial District Court

Style: ROYCE GOODSON VS CITY OF MONTGOMERY, WILLIAM J. KOTLAN, AND JOHN FOX

To: JOHN FOX

Address for Service: 101 OLD PLANTERSVILLE RD MONTGOMERY, TX 77356

Came to hand the 2 day of August, 2013, at 9:25 o'clock, and executed in MONTGOMERY County, Texas by delivering to each of the within named defendants in person, a true copy of this Citation with the date of delivery endorsed thereon, together with the accompanying copy of the ROYCE GOODSON'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE, at the following times and places, to wit:

Name	Date/Time	Place, Course and Distance from Courthouse
<u>John Fox</u>	<u>26 Aug 2013 1556</u>	<u>101 Old Plantersville Rd MONTGOMERY TX 77356</u>

Manner of service: in person

*And not executed as to the defendant(s) _____

The diligence used in finding said defendant(s) being: _____

and the cause or failure to execute this process is: _____

and information received as to the whereabouts of said defendant(s) being: _____

FEES:

Serving Petition and Copy \$ _____
TOTAL \$ _____

By: [Signature] OFFICER
County, Texas
Deputy

Affiant

Don Chumley
Montgomery County
Constable Precinct #1
115 Business Park Dr.
Willis, TX 77378

Complete if you are a person other than a Sheriff, Constable, or Clerk of the Court. In accordance with Rule 107: the officer or authorized person who serves, or attempts to serve a citation shall sign the return. The return must either be verified or be signed under penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

My full name is _____ my date of birth is _____, and my address is _____.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the ____ day of _____ 20__.

Declarant/Authorized Process Server

ID# & Exp. of Certification _____

RECEIVED & FILED FOR RECORD
BARBARA GLADDEN ADAMICK DISTRICT
CLERK, MONTGOMERY COUNTY, TEXAS

Cause Number 13-07-07934 -CV

2013 JUL 26 AM 11:24

Royce Goodson,

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In the District Court

Plaintiff,

BY [Signature]
DEPUTY

versus

of Montgomery County, Texas

City of Montgomery, William J. Kotlan,
and John Fox,

Defendants

284th Judicial District

**Royce Goodson's Original Petition, Jury Demand,
and Request for Disclosure**

To the Honorable District Judge:

Royce Goodson, Plaintiff, complaining of City of Montgomery, Bill Kotlan, and John Fox, Defendants, files this Original Petition, Jury Demand, and Request for Disclosure:

Introduction

1. Defendants violated Police Chief Royce Goodson's ("Chief Goodson") rights to procedural and substantive due process under the Fifth Amendment to the United States Constitution made applicable to the States (and subdivisions thereof) under the Fourteenth Amendment, in violation of 42 U.S.C. § 1983. Chief Goodson intends to conduct discovery pursuant to Level 2 of Rule 190.

Parties and Venue

2. Plaintiff Royce Goodson is a natural person who resides in Montgomery County, Texas.
3. Defendant City of Montgomery is a subdivision of the State of Texas, which a

SCANNED

process server may serve with citation by serving the mayor, John Fox, at 101 Old Plantersville Road, Montgomery, Montgomery County, Texas 77356.

4. Defendant William J. Kotlan is a natural person whom a process server may serve with citation at his home at 8 Lake Forest Drive, Conroe, Montgomery County, Texas 77384.
5. Defendant John Fox is a natural person whom a process server may serve with citation at his place of business at 101 Old Plantersville Road, Montgomery, Montgomery County, Texas 77356.
6. Venue is proper in Montgomery County, Texas, because (i) Montgomery County is the county in which all or a substantial part of the events or omissions giving rise to the claim occurred, (ii) Montgomery County is the county of Defendants' residence; (iii) Montgomery County is the county of Plaintiff's residence; and (iv) Montgomery County is the county in which the City of Montgomery is located, so that venue is proper under the general venue statute of section 15.002 of the Texas Civil Practice and Remedies Code and under section 15.0151(a)(second sentence) of the Texas Civil Practice and Remedies Code.

Facts

7. The City of Montgomery, Texas (the "City") brought Royce Goodson ("Chief Goodson"), an accomplished law enforcement officer, into the position of Chief of Police in order to clean up the City's Police Department that had suffered from years of corruption, dirty politics, self-dealing, and in-fighting.

8. After Chief Goodson successfully cleaned up the Police Department, Defendants terminated Chief Goodson as Chief of Police of City of Montgomery solely because Chief Goodson refused to commit criminal acts that City Administrator Bill Kotlan and Mayor John Fox insisted that Chief Goodson commit. Defendants insisted that Chief Goodson discipline one of the City's Police Officers because she had performed her law enforcement function zealously and that Chief Goodson discipline another one of the City's Police Officers because he had prepared a law enforcement report in the manner which his job duties required. If Chief Goodson had taken the actions which the City Administrator and the Mayor had insisted that he take, Chief Goodson would have prevented or delayed the service of those Police Officers as public servants in violation of Section 36.06(1) and 36.06(2) of the Texas Penal Code, obstruction of justice, which is a third-degree felony in the State of Texas.
9. Both Defendants Bill Kotlan and John Fox met with Chief Goodson and made clear to him that Chief Goodson's job performance was excellent but they asked Chief Goodson to resign on May 21, 2013. When Chief Goodson refused to resign, Defendants Bill Kotlan and John Fox suspended the employment of Chief Goodson until further action at the scheduled May 28, 2013, City Council meeting.
10. At and before the May 28, 2013, City Council meeting, Defendants violated the Texas Open Meetings Act, Chapter 551 of the Texas Government Code, in at least

three respects. First, Defendants Bill Kotlan and John Fox had lobbied to terminate and replace Chief Goodson well before that meeting. Long before that meeting, one of the senior Police Officers of the City informed Chief Goodson that Defendants had informed him that Joe Napolitano would replace Chief Goodson as Chief of Police. In fact, at the City Council meeting subsequent to the May 28, 2013, City Council meeting, the City appointed Joe Napolitano as the City's Chief of Police. Second, Defendants had created a list of complaints that they claimed they had about Chief Goodson. They were unable to substantiate any of those complaints factually and had clearly discussed those matters with members of the City Council prior to the May 28 City Council meeting. Third, Chief Goodson demanded - in writing and verbally - that the City Council act on his employment status in an open meeting rather than behind closed doors as is his right under Section 551.074(b) of the Texas Government Code. Despite Chief Goodson's written and verbal demands, the City Council proceeded to conduct a closed-door meeting - without Goodson - regarding Goodson's employment and then obstructed Chief Goodson's attempt to discuss his employment status before the open City Council meeting. After very brief discussion in the open meeting, the City Council proceeded to terminate Chief Goodson as an employee of the City.

11. After terminating Chief Goodson in a City Council meeting where Defendants violated the Texas Open Meeting Act in at least three major respects, Defendants

proceeded to engage in the criminal acts, which Chief Goodson had refused to commit. Chief Goodson appealed the adverse employment decision in accordance with the City's written policies. The City refused to follow its own procedures in considering the appeal and baldly refused even to consider the appeal.

12. Chief Goodson has suffered actual damages in the form of lost back and future wages and damage to his reputation in amounts far in excess of this Court's minimum jurisdictional amount.

Count One

Cause of Action under 42 U.S.C. § 1983

14. Plaintiff incorporates paragraphs 1 through 12 herein as though set forth at length.
15. Defendants committed their wrongful acts under color of state law. Defendants misused their power under color of state law. Specifically, City Administrator Bill Kotlan and Mayor John Fox sought to commit criminal acts and insisted that Chief Goodson commit those criminal acts for him. Chief Goodson refused. Defendants Bill Kotlan and Mayor John Fox, therefore, pursued their personal objectives and misused their power to terminate Chief Goodson without procedural or substantive due process.
16. Defendants' wrongful conduct deprived Chief Goodson of his rights, privileges, or immunities, which the Constitution of the United States and the laws of the United States secure, in violation of 42 U.S.C. § 1983. Defendants' actions have deprived Plaintiff of his procedural and substantive due process rights in violation

of the Fifth and Fourteenth Amendments to the United States Constitution.

17. Plaintiff seeks actual damages in excess of this Court's minimum jurisdictional amount, including, without limitation, lost (past and future) wages and damage to reputation.
18. Plaintiff's injury resulted from Defendants' reckless and callous indifference to and complete floccinaucinihilipilification of the protected rights of Plaintiff or done with an evil intent and with malice, so that Plaintiff is entitled to exemplary damages in excess of this Court's minimum jurisdictional amount.
19. Plaintiff is entitled to his reasonable and necessary attorney's fees pursuant to 42 U.S.C.A. § 1988(b) for trial and preparation and for appeals in amounts far in excess of this Court's minimum jurisdictional amount.

Request for Disclosure

To: Defendants City of Montgomery, Bill Kotlan, and John Fox.

Pursuant to Rule 194, you are requested to disclose, within 50 days of service of this request, the information or material described in Rule 194.2.

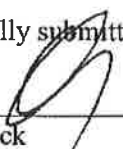
Prayer

Royce Goodson, Plaintiff, prays that the Court cite Defendants City of Montgomery, Bill Kotlan, and John Fox, to appear and answer herein and, upon final hearing, award him:

1. Actual damages far in excess of this Court's minimum jurisdictional amount;
2. Exemplary damages far in excess of this Court's minimum jurisdictional amount;
3. Prejudgment and postjudgment interest at the maximum lawful rate;

4. Attorney fees as pled in above in paragraph 19, *supra*;
5. Costs of Court; and
6. Such other and further relief to which Royce Goodson may show himself entitled.

Respectfully submitted,




Eric Yollick
State Bar Number 22160100
Travis Owens
State Bar Number 24065859
Post Office Box 7571
The Woodlands, Texas 77387-7571
Telephone 281.363.3591
Fax 281.363.0488

Attorneys for Plaintiff Royce Goodson

Jury Demand

Royce Goodson demands a jury of his peers and declares that he has paid all necessary jury fees.



Eric Yollick

CIVIL CASE INFORMATION SHEET

RECEIVED & FILED FOR RECORD
BARBARA GLADEN ADAMICK DISTRICT
CLERK, MONTGOMERY COUNTY, TEXAS


CAUSE NUMBER (FOR CLERK USE ONLY):

13-07-07934 CV

COURT (FOR CLERK USE ONLY):

STYLED

2013 JUL 26 AM 11:24

1. Contact information for person completing case information sheet:		Name of parties in case:		
Name: Eric Yollick	Email: eric yollick@swbell.net	Plaintiff(s)/Petitioner(s): Royce Goodson	<input checked="" type="checkbox"/> Attorney for Plaintiff <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other:	
Address: P.O. Box 7571	Telephone: 281.363.3591	Defendant(s)/Respondent(s): City of Montgomery William J. Kotlan John Fox	Additional Parties in Child Support Case: Custodial Parent: Non-Custodial Parent: Presumed Father:	
City/State/Zip: The Woodlands, TX 77387-7571	Fax: 281.363.0488	Signature:  State Bar No: 22160100 (Attach additional page as necessary to list all parties)		
2. Indicate case type, or identify the most important issue in the case (select only 1):				
Civil		Family Law		
Contract <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract:	Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: <input type="checkbox"/> Other Injury or Damage:	Real Property <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other:	Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other:	Post-Judgment Actions (Non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child:
Employment <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment:	Other Civil <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property	<input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input checked="" type="checkbox"/> Other: Civil Rights		
Tax <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax	Probate & Mental Health Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings	<input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other:		
3. Indicate procedure or remedy, if applicable (may select more than 1):				
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action	<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment	<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover		
4. Indicate damages sought (do not select if it is a family law case):				
<input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input checked="" type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input type="checkbox"/> Over \$1,000,000				

SCANNED